

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE LORAZEPAM & CLORAZEPATE
ANTITRUST LITIGATION

This document relates to:

ST. CHARLES HOSPITAL and
REHABILITATION CENTER,

Plaintiff,

v.

MYLAN LABORATORIES, INC., et al.,

Defendants.

ADVOCATE HEALTH CARE, et al.,

Plaintiffs,

v.

MYLAN LABORATORIES, INC., et al.,

Defendants.

MDL-1290 (TFH/JMF)
Misc. No. 99ms276
Judge Thomas F. Hogan

FILED

OCT 30 2002

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

CV 1:99-790 (TFH/JMF)

CV 1:99-2228 (N.D. Ill.)

STIPULATION AND PROPOSED ORDER

This will set forth the agreement of plaintiffs and defendants, through counsel, with respect to the remainder of the briefing schedules for the following motions which already have been filed with the Court: (1) Defendants' Motion for Partial Summary Judgment or, Alternatively, to Exclude Releasors from the Class (the "Partial Summary Judgment Motion"); (2) Defendants' Motion to Accept Opt-Out Letters and Exclude Opt-Out Parties (the "Opt-Out Motion"); (3) Class Plaintiffs' Motion for Curative Notice to Certain Class Members (the "Curative Notice Motion"); (4) Class

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Plaintiffs' Motion for Protective Order (the "Protective Order Motion"); and (5) Defendants' Motion to Compel Compliance With Subpoena (the "Motion to Compel"):

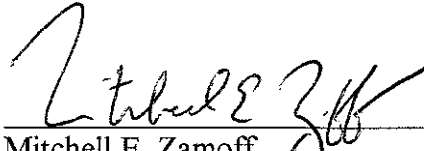
1. Class plaintiffs' oppositions to the Partial Summary Judgment Motion and the Opt-Out Motion shall be filed on or before October 29, 2002.
2. Class plaintiffs' consolidated reply memorandum in support of the Protective Order Motion and in opposition to the Motion to Compel shall be filed on or before November 8, 2002.
3. Defendants' reply memoranda in support of the Partial Summary Judgment Motion and the Opt-Out Motion shall be filed on or before November 14, 2002.
4. Class plaintiffs' reply memorandum in support of the Curative Notice Motion shall be filed on or before November 14, 2002.
5. Defendants' reply memorandum in support of the Motion to Compel shall be filed on or before November 26, 2002.
6. Class plaintiffs represent that they have conferred with counsel for Cardinal Health, Inc., Walgreen Company and Randall's Warehouse – subjects of the Motion to Compel – with respect to this schedule and that counsel for those three class members have indicated that they will abide by this Stipulation with respect to any separate response that they might file to the Motion to Compel. In the event that any of the class members named in the Motion to Compel does not abide by this Stipulation or the Local Rules with respect to the filing of an opposition to the Motion to Compel, defendants shall have the right to submit a reply to such later-filed opposition within 7 days after the filing of the later-filed opposition, limited to the new issues raised in the later-filed opposition to which it responds.

7. In view of the multiple extensions of time granted with respect to the motions covered by this Stipulation, defendants do not believe that any party, absent consent, should be permitted any additional extensions of time with respect to the briefing of those motions.



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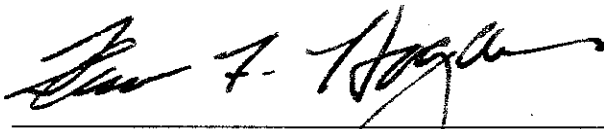
On behalf of Plaintiffs



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On behalf of Defendants

SO ORDERED:



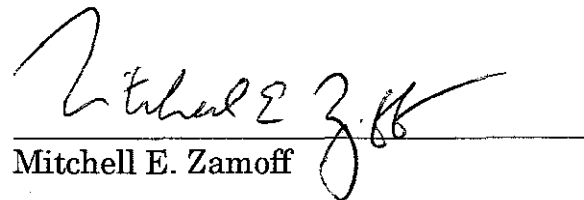
HONORABLE THOMAS F. HOGAN
United States District Court Judge

04-29-2002

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Mitchell E. Zamoff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Stipulation was served, this 28th day of October, 2002, on:

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